

# **ACTION PLAN FOR ADDRESSING DAVIS-BESSE LESSONS LEARNED TASK FORCE RECOMMENDATIONS REGARDING INSPECTION, ASSESSMENT, AND PROJECT MANAGEMENT GUIDANCE**

Last Update: Initial Update (2/27/03)  
Lead Division: DIPM  
Supporting Division: DLPM  
Supporting Office: Regions

<u>TAC No.</u>	<u>Description</u>
MB7281	Develop Action Plan
MB7726	Evaluation of Inspection and Assessment Guidance

Milestone	Date (T=Target) (C=Complete)	Lead	Support
<b>Part 1: Evaluation of Inspection Guidance Related To Problem Identification and Resolution</b>			
<p>The NRC should revise its inspection guidance to provide assessments of: (1) the safety implications of long-standing, unresolved problems; (2) corrective actions phased in over several years or refueling outages; and (3) deferred modifications. [LLTF 3.2.5.(2) High]</p> <p>The NRC should revise the overall PI&amp;R inspection approach such that issues similar to those experienced at DBNPS are reviewed and assessed. The NRC should enhance the guidance for these inspections to prescribe the format of information that is screened when determining which specific problems will be reviewed. [LLTF3.3.2.(2) Low]</p> <p>The NRC should provide enhanced Inspection Manual Chapter guidance to pursue issues and problems identified during plant status reviews [LLTF3.3.2.(3) Low]</p> <p>The NRC should revise its inspection guidance to provide for the longer-term follow-up of issues that have not progressed to a finding. [LLTF3.3.2.(4) Low]</p>			
1. Make changes to IP 71152 to require annual follow-up of three to six issues	01/2002 (C)	DIPM	
2. PI&R focus group assess lessons learned recommendations	03/03 (T)	DIPM	Regions
3. Develop draft procedure changes based on PI&R group recommendations and provide to regions for review	04/03 (T)	DIPM	Regions
4. Provide training on procedure changes	11/03 (T)	DIPM	
5. Issue procedure changes	12/03 (T)	DIPM	

Milestone	Date (T=Target) (C=Complete)	Lead	Support
<b>PART 2: Evaluation of IMC 0350 Guidance</b>			
The NRC should develop guidance to address the impacts of IMC 0350 implementation on the regional organizational alignment and resource allocation. [LLTF3.3.5.(4) High]			
1. Assess past and present IMC 0350 data and associated inspection approaches	04/03 (T)	DIPM	Regions
2. Develop enhanced structure to the inspection approach used for IMC 0350 plants	08/03 (T)	DIPM	Regions
3. Develop draft revisions to IMC and issue for regional comment	09/03 (T)	DIPM	
4. Issue procedure revisions	12/03 (T)	DIPM	
5. Include estimated resources for IMC 0350 plants into budget cycles	12/03 (T)	DIPM	
<b>Part 3: Evaluation of Project Management Guidance</b>			
The NRC should establish guidance to ensure that decisions to allow deviations from agency guidelines and recommendations issued in generic communications are adequately documented. [LLTF 3.3.7.(2) High]			
1. The DLPM Handbook will be updated with a new section that addresses documenting staff decisions.	02/03 (C)	DLPM	
2. A training package emphasizing compliance with the requirements of MD 3.53 will be developed and distributed to all Offices and regions.	04/03 (T)	DLPM	

**Description:** The Davis Besse Lessons Learned Task Force (LLTF) identified several issues concerning the NRC's oversight, inspection, and project management guidance. The LLTF recommended that changes be made to the NRC's inspection program to ensure that sufficient inspections are conducted of long-standing unresolved problems, that guidance be developed to assess the impacts of Inspection Manual Chapter 0350 on regional resource allocations, and that

guidance be developed to ensure that decisions to allow deviations from agency guidelines in generic communications are adequately documented.

**Historical Background:** The Davis Besse LLTF conducted an independent evaluation of the NRC's regulatory processes related to assuring reactor vessel head integrity in order to identify and recommend areas of improvement applicable to the NRC and the industry. A report summarizing their findings and recommendations was published on September 30, 2002. The report contains several consolidated lists of recommendations. The LLTF report was reviewed by a Review Team (RT), consisting of several senior management personnel appointed by the EDO. The RT issued a report on November 26, 2002, endorsing all but two of the LLTF recommendations, and placing them into four overarching groups. On January 3, 2003, the EDO issued a memo to the Director, NRR, and the Director, RES, tasking them with a plan for accomplishing the recommendations. This action plan addresses the Group 3 recommendations of the Davis-Besse Lessons Learned Task Force regarding inspection, assessment, and project management guidance. As directed by the EDO's memo, this action plan includes the 3 high priority recommendations in the "Evaluation of Inspection, Assessment, and Project Management Guidance" grouping. In addition, three low priority recommendations are included since they are closely related to the high priority recommendations and will be accomplished in conjunction with the work necessary to resolve the high priority items. The LLTF recommendations are also listed in the attached Table 1.

**Proposed Actions:** Parts 1, 2, and 3 of this action plan are unrelated and will be worked as three independent efforts. The recommendations associated with the inspection program will be reviewed by the Problem Identification and Resolution (PI&R) focus group which is made up of headquarters and regional representatives. The focus group will assess whether changes to the current PI&R inspection approach are warranted. Procedure changes will then be made as appropriate, and inspector training will be conducted.

The recommendation associated with IMC 0350 will be assessed by evaluating the previous inspection approaches used and associated resource expenditures for plants that entered the IMC 0350 process. The staff will then attempt to better define a more enhanced inspection framework for a plant that enters IMC 0350. Once this additional inspection guidance is completed, a better estimate of resources will be made, and resources for IMC 0350 will be included in budget projections.

Project management guidance regarding documentation when accepting deviations from generic communications recommendations will be incorporated into the DLPM handbook and into training materials to be distributed to all Offices and Regions.

**Originating Documents:** Memorandum from Travers, W.D. to Collins, S. and Thadani, A. C., dated January 3, 2003, "Actions Resulting From The Davis-Besse Lessons Learned Task Force Report Recommendations." (ML023640431)

Memorandum from Paperiello, C.J. to Travers, W.D., dated November 26, 2002, "Senior Management Review of the Lessons-Learned Report of the Davis-Besse Nuclear Power Station Reactor Pressure Vessel Head." (ML023260433)

Memorandum from Howell, A.T. to Kane, W.F., dated September 30, 2002, "Degradation of the Davis-Besse Nuclear Power Station Reactor Pressure Vessel Head Lessons-Learned Report." (ML022740211)

**Regulatory Assessment:** It is not anticipated that this action plan will result in any additional regulatory requirements on licensees. The plan focuses on what enhancements should be made to existing inspection and project management guidance to ensure better scope, efficiency, and documentation of such activities.

**Current Status:** This is the initial update for this Action Plan, which addresses the Group 3 recommendations of the Davis-Besse Lessons Learned Task Force Review Team regarding inspection, assessment, and project management guidance.

**Potential Problems:** None currently identified

**Proposed Resolution of Potential Problems:** N/A

**Schedule Changes Since Last Update:** This is the initial update.

**Resource Expenditure:** As of February 22, 2003, 91.5 hours (=0.1 FTE) have been expended by NRR on the TACs listed for this Action Plan.

TAC No.	TAC Status	HOURS
MB7281- Action Plan Development	OPEN	91.5
MB 7726 - Evaluation of Inspection and Assessment Guidance	Requested	

An additional 0.6 FTE in FY2003 (NRR: 0.5 FTE, Regions: 0.1 FTE) and 0.3 FTE in FY 2004 (NRR: 0.2 FTE, Regions: 0.1 FTE) are anticipated to complete the tasks in this action plan. About half of those hours are already accounted for in the budget under budget items for program improvements, program oversight, and program development.

**Priority:** 2

**Contacts:**

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Overall Lead for DB LLTF response:	Brendan Moroney, DLPM, 415-3974

**References:**

Inspection Manual 0350, "Oversight of Operating Reactor Facilities in an Extended Shutdown as a Result of Significant Performance Problems."

**Table 1**  
**LLTF Report Recommendations Included in This Action Plan**

<b>RECOMMENDATION NUMBER</b>	<b>RECOMMENDATION</b>	<b>Priority</b>
3.2.5.(2)	The NRC should revise its inspection guidance to provide assessments of: (1) the safety implications of long-standing, unresolved problems; (2) corrective actions phased in over several years or refueling outages; and (3) deferred modifications.	High
3.3.2.(2)	The NRC should revise the overall PI&R inspection approach such that issues similar to those experienced at DBNPS are reviewed and assessed. The NRC should enhance the guidance for these inspections to prescribe the format of information that is screened when determining which specific problems will be reviewed.	Low
3.3.2.(3)	The NRC should provide enhanced Inspection Manual Chapter guidance to pursue issues and problems identified during plant status reviews [3.3.2.(3)]	Low
3.3.2.(4)	The NRC should revise its inspection guidance to provide for the longer-term follow-up of issues that have not progressed to a finding.	Low
3.3.5.(4)	The NRC should develop guidance to address the impacts of IMC 0350 implementation on the regional organizational alignment and resource allocation.	High
3.3.7.(2)	The NRC should establish guidance to ensure that decisions to allow deviations from agency guidelines and recommendations issued in generic communications are adequately documented.	High